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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

29 Plaintiffs,

30 v.

31 DONALD J. TRUMP, in his official capacity
32 as President of the United States, et al.,

33 Defendants.

34 Case No. 3:25-cv-03698-SI

35 **DECLARATION OF KORY BLAKE**

DECLARATION OF KORY BLAKE

I, Kory Blake, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Area Field Services Director (“AFSD”) for the Eastern Region in the Organizing and Field Services department of the American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME” or “International Union”). As AFSD, I am responsible for providing guidance and leadership to the efforts of the International Union and affiliates in mobilizing the membership in support of AFSCME’s programs. This includes coordinating and allocating AFSCME resources to affiliates within my assigned region, identifying AFSCME programs and services to meet the needs of affiliates, and engaging directly with council or local union leaders and members on organizing, contract and political campaigns. I am assigned to support AFSCME affiliates located in Washington, D.C., Maryland, and Virginia, including coordinating support and resources to AFSCME’s federal government employee affiliates and members. I have been an AFSD for AFSCME since 2020.

3. AFSCME is a national labor organization and unincorporated membership association headquartered at 1625 L Street N.W., Washington, D.C. 20036. AFSCME is the largest trade union of public employees in the United States, with around 1.4 million members organized into approximately 3,400 local unions, 58 councils and other affiliates, including retiree councils and chapters, in 46 states, including California, the District of Columbia, and Puerto Rico. AFSCME has approximately 185,000 members in the State of California. AFSCME, through its affiliate District Council 20 and its 18 constituent federal government local unions, as well as its affiliate United Nurses Associations of California/Union of Health Care Professionals (UNAC/UHCP), represents around 9,000 federal civilian employees in agencies and departments across the federal government, including more than 6,000 employees at eight agencies and various subdivisions in the Executive Department.

4. AFSCME organizes employees and advocates for fairness in the workplace, better

1 wages and working conditions, excellence in public services, and prosperity and opportunity for
2 all working families. AFSCME's core functions include providing support, guidance, and
3 resources to our affiliates, some of which are the officially recognized exclusive representatives of
4 federal employees in various bargaining units.

5 5. Membership in AFSCME is voluntary.

6 6. AFSCME's and its subordinate bodies' leadership is democratically elected by and
7 from among its membership.

8 7. AFSCME's activities and staff are funded through our members' voluntary dues,
9 which are established by the AFSCME International Constitution and based on the percentage of
10 hours worked for part-time or full-time members. These membership dues are paid via a direct,
11 automatic deduction from the member's federal government paycheck, which goes to the
12 AFSCME affiliate representing the member first, which then in turn remits a portion of those dues
13 to AFSCME.

14 8. AFSCME members include nurses, corrections officers, childcare providers,
15 emergency medical technicians, sanitation workers, school bus drivers, civil engineers, policy
16 analysts, and more. Its members working for the Executive Department of the federal government
17 work to ensure aviation safety at the Department of Transportation's (DOT) Federal Aviation
18 Administration (FAA), criminal justice through the Department of Justice (DOJ), food safety, rural
19 development, and facilitation of international trade for U.S. farmers through the U.S. Department
20 of Agriculture (USDA), civic engagement through service and volunteering through AmeriCorps
21 and the Peace Corps, providing health care at the Jerry L. Pettis Memorial Veterans' Hospital (VA)
22 and the Naval Medical Center San Diego (DOD), and providing objective news and information
23 about the U.S. and the world to people who lack access to objective information at Voice of
24 America (VOA) as employees of the United States Agency for Global Media (USAGM).

25 **AFSCME Members at the Department of Justice**

26 9. AFSCME has five locals that represent bargaining units in different subdivisions
27 of the DOJ. The mission of the DOJ is to uphold the rule of law, to keep our country safe, and to
28

1 protect civil rights. AFSCME's locals represent DOJ employees working in Office of Justice
2 Programs, U.S. Parole Commission, Justice Management Division, Office of Community Oriented
3 Policing Services, and some of the DOJ's Litigation Divisions.

4 10. AFSCME Local 2830 represents a collective bargaining unit of approximately 600
5 DOJ, Office of Justice Programs (OJP) employees. Local 2830 represents all full-time and
6 regularly scheduled part-time professional and non-professional OJP employees in Washington
7 D.C. The OJP is the DOJ's largest grant making component, and bargaining unit employees work
8 within various departments within the subdivision, including the Bureau of Justice Assistance,
9 Bureau of Justice Statistics, Office of Administration, Office of the Assistant Attorney General,
10 Office of Audit Assessment and Management, Office of the Chief Information Officer, Office of
11 the Chief Financial Officer, Office of Civil Rights, Office of Communications, Office of Juvenile
12 Justice and Delinquency Prevention, Office for Victims of Crime, National Institute of Justice, Sex
13 Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking Office. While OJP is
14 a DOJ component, it does not engage in intelligence, counterintelligence, investigative, or national
15 security work as its primary function. OJP's classification is Sensitive But Unclassified (SBU).

16 11. Many OJP bargaining unit employees who are Grants Management Specialists
17 manage and support over \$15 billion in open criminal and juvenile justice-related science and
18 statistics grant programs and contracts in some capacity. Managing grants and contracts involves
19 monitoring awards programmatically and fiscally, as well as overseeing training and technical
20 assistance for grantees. OJP's support functions include ensuring that grantees do not violate the
21 civil rights of program recipients, providing Information Technology (IT) support for the Justice
22 Grants and other systems, managing human resources, overseeing public affairs, including
23 tracking legislation and responding to inquiries, and facilities management.

24 12. Other OJP bargaining unit employees include Accountants, Administrative
25 Officers, Attorneys, Auditors, Senior Policy Advisors, Social and Physical Scientists, Social
26 Science Research Analysts, Statisticians, Management and Program Analysts, Program
27 Specialists, Public Affairs Specialists, Writer-Editors, Technology Advisors, Information
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1 Technology Specialists, and more. AFSCME Local 2830 represents the interests of the DOJ, OJP
2 employees. The local's core functions include providing support, guidance, and resources to
3 bargaining unit employees as their officially recognized exclusive representative. As the exclusive
4 representative for the nonsupervisory OJP employees, AFSCME Local 2830 enters into collective
5 bargaining negotiations with the DOJ on a wide variety of terms and conditions of employment
6 and represents bargaining unit members through the negotiated grievance process. AFSCME Local
7 2830 and the OJP are parties to a collective bargaining agreement ("CBA") that memorializes
8 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other
9 procedures of the workplace. This agreement has been effective since 2013 and automatically
10 renews on an annual basis, unless either party requests to bargain a new agreement. AFSCME
11 Local 2830 represents and advocates for bargaining unit members in resolving workplace disputes
12 with the OJP through informal meetings, formal meetings, the negotiated grievance procedure up
13 to and including arbitration.

14 13. AFSCME Local 2940 represents a collective bargaining unit of approximately 18
15 DOJ, U.S. Parole Commission employees. The mission of the Parole Commission is to promote
16 public safety and strive for justice and fairness in the exercise of its authority to release and revoke
17 offenders under its jurisdiction. Local 2940 represents all non-professional and non-supervisory
18 employees of the Parole Commission in Washington, D.C. Bargaining unit members are involved
19 in the protecting the public safety.

20 14. These employees include Analysts and support staff. The Analyst recommends
21 sanctions to be imposed for individuals on parole/supervised release to keep them compliant in the
22 community. If the releasee continues to have non-compliance issues, Analyst ultimately
23 recommend warrants to be issued to return them to federal custody or impose pre-release
24 conditions to assist the releasees with a positive transition back into the community. In addition,
25 Analysts review cases to determine if the releasee meets guideline requirements for possible early
26 termination of their parole/ supervised release term. The support staff assist with locating
27 witnesses, scheduling hearings, designation request to the Bureau of Prisons and issue Notice of
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1 Actions with the outcome of all hearings and actions ordered by a Parole Commissioner.

2 15. AFSCME Local 2940 represents the interests of the Parole Commission employees.
3 The local's core functions include providing support, guidance, and resources to bargaining unit
4 employees as their officially recognized exclusive representative. As the exclusive representative
5 for the nonsupervisory Parole Commission employees, AFSCME Local 2940 enters into collective
6 bargaining negotiations with the DOJ on a wide variety of terms and conditions of employment
7 and represents bargaining unit members through the negotiated grievance process. AFSCME Local
8 2940 and the Parole Commission are parties to a collective bargaining agreement that
9 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance
10 procedure and other procedures of the workplace. This agreement has been effective since 2018
11 and automatically renews on an annual basis unless either party requests to bargain a new
12 agreement. AFSCME Local 2940 represents and advocates for bargaining unit members in
13 resolving workplace disputes with the Parole Commission through informal meetings, formal
14 meetings, the negotiated grievance procedure, up to and including arbitration.

15 16. AFSCME Local 3097 represents a collective bargaining unit of approximately 9
16 DOJ, Justice Management Division (JMD) employees. The mission of the JMD is to provide
17 advice and counsel to senior management officials relating to all administrative functions of the
18 Department. Local 3097 represents all JMD professional and non-professional employees in
19 Washington, D.C.

20 17. AFSCME Local 3097 represents the interests of the JMD employees. The local's
21 core functions include providing support, guidance, and resources to bargaining unit employees as
22 their officially recognized exclusive representative. As the exclusive representative for the
23 nonsupervisory JMD employees, AFSCME Local 3097 enters into collective bargaining
24 negotiations with the DOJ on a wide variety of terms and conditions of employment and represents
25 bargaining unit members through the negotiated grievance process. AFSCME Local 3097 and the
26 JMD are parties to a collective bargaining agreement that memorializes negotiated terms and
27 conditions of employment, benefits, rules, a grievance procedure and other procedures of the
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1 workplace. This agreement has been effective since 2012 and automatically renews on an annual
2 basis, unless either party requests to bargain a new agreement. AFSCME Local 3097 represents
3 and advocates for bargaining unit members in resolving workplace disputes with the JMD through
4 informal meetings, formal meetings, the negotiated grievance procedure up to and including
5 arbitration.

6 18. AFSCME Local 3187 represents a collective bargaining unit of approximately 56
7 DOJ, Office of Community Oriented Policing Services (COPS) employees. COPS is the
8 component of the DOJ responsible for advancing the practice of community policing by the
9 nation's state, local, territorial, and tribal law enforcement agencies through information and grant
10 resources. Bargaining unit members include Policy Analysts, Grant Management Specialists,
11 Program Specialist, Accountants, Auditors, Social Science Analysts, Management and Program
12 Analysts, Administrative Services Specialists, and IT Specialist. These employees develop and
13 manage grant programs for law enforcement, including managing individual grants; monitoring
14 and oversee grantees, including ensuring compliance with federal laws and regulations around
15 spending of grant funds and to ensure no fraud occurs; managing the fiscal affairs of the agency,
16 such as travel spending; and managing the IT infrastructure of the agency.

17 19. AFSCME Local 3187 represents the interests of the COPS employees. The local's
18 core functions include providing support, guidance, and resources to bargaining unit employees as
19 their officially recognized exclusive representative. As the exclusive representative for the
20 nonsupervisory COPS employees, AFSCME Local 3187 enters into collective bargaining
21 negotiations with the DOJ on a wide variety of terms and conditions of employment and represents
22 bargaining unit members through the negotiated grievance process. AFSCME Local 3187 and the
23 COPS are parties to a collective bargaining agreement that memorializes negotiated terms and
24 conditions of employment, benefits, rules, a grievance procedure and other procedures of the
25 workplace. AFSCME Local 3187 represents and advocates for bargaining unit members in
26 resolving workplace disputes with the COPS through informal meetings, formal meetings, the
27 negotiated grievance procedure up to and including arbitration.

1 20. AFSCME Local 3719 represents a collective bargaining unit of approximately 693
2 DOJ, Office of Solicitor General, Litigating Division employees. The local represents Professional
3 Administrative Support Staff (PASS) employed by the Antitrust, Civil Rights, Civil, Environment
4 and Natural Resources, and the Tax Litigating Divisions in Washington D.C. AFSCME Local
5 3719 does not represent any employees in the DOJ's National Security Litigating Division. The
6 local's bargaining unit members include Administrative Assistants, Legal Assistants, Legal
7 Technicians, Civil Analyst, Paralegals, and Equal Opportunity Specialists. These employees
8 provide litigation support to trial teams, investigations, testing of discriminatory practices,
9 compliances, and all matters necessary for litigation.

10 21. AFSCME Local 3719 represents the interests of the Litigating Division employees.
11 The local's core functions include providing support, guidance, and resources to bargaining unit
12 employees as their officially recognized exclusive representative. As the exclusive representative
13 for the nonsupervisory Litigating Division employees, AFSCME Local 3719 enters into collective
14 bargaining negotiations with the DOJ's Litigating Divisions on a wide variety of terms and
15 conditions of employment and represents bargaining unit members through the negotiated
16 grievance process. AFSCME Local 3719 and the Litigating Divisions are parties to a collective
17 bargaining agreement that memorializes negotiated terms and conditions of employment, benefits,
18 rules, a grievance procedure and other procedures of the workplace. This agreement has been
19 effective since 2002 and renews on an annual basis unless either party requests to bargain a new
20 agreement. AFSCME Local 3719 represents and advocates for bargaining unit members in
21 resolving workplace disputes with the Litigating Division through informal meetings, formal
22 meetings, the negotiated grievance procedure up to and including arbitration.

23 **AFSCME Members at the Department of Transportation**

24 22. AFSCME Local 1653 represents a bargaining unit of over 2,000 non-supervisory
25 civil servants who work for the FAA, a subordinate agency to the Department of Transportation.
26 The FAA's mission is to provide the safest, most efficient aerospace system in the world. These
27 employees include Aviation Safety Inspectors, Regulation Analysts, Accident Investigators,
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1 Economists, Computer Scientists, Regulation Attorneys, Enforcement Attorneys, Program
2 Managers, Administrative Staff and Office Assistants, Operation Research Analysts, Policy
3 Analysts, Technical Operations Specialists, Airport Inspectors, and others. Also in the bargaining
4 unit are employees who work within the Air Traffic Organization and Aviation Safety departments
5 at the FAA's headquarters, which is located in Washington, D.C.

6 23. AFSCME Local 1653 bargaining unit employees all report to the FAA
7 headquarters, but some employees' duty stations are in other states including California, New
8 Jersey, Oklahoma, Washington, Georgia, and others.

9 24. AFSCME Local 1653 represents the interests of the FAA's non-supervisory civil
10 servants. As the exclusive representative for the nonsupervisory FAA civil servants, AFSCME
11 Local 1653 enters into collective bargaining negotiations with the FAA on a wide variety of terms
12 and conditions of employment and represents bargaining unit members through the negotiated
13 grievance process. AFSCME Local 1653 and the FAA are parties to a collective bargaining
14 agreement that memorializes negotiated terms and conditions of employment, benefits, rules, a
15 grievance procedure and other procedures of the workplace. The current agreement has a term of
16 four years and expires on January 17, 2029.

17 **AFSCME Members at the Department of Agriculture**

18 25. AFSCME has five locals that represent bargaining units in different subdivisions
19 of the U.S. Department of Agriculture ("USDA"). These subdivisions include the USDA's Office
20 of Operations, National Appeals Division, Rural Development, Farm Production and Conservation
21 Business Center, Farm Service Agency, and Risk Management Agency, and the Foreign
22 Agricultural Service.

23 26. AFSCME Local 3976 represents the USDA's Foreign Agricultural Service
24 ("FAS"), the foreign affairs arm of the USDA. Its primary mission is to open trade in other
25 countries and assist farmers and producers in the United States to export their agricultural products
26 abroad. In other words, FAS helps farmers and producers in the U.S. grow and thrive by opening
27 foreign markets to American agricultural products.

1 27. AFSCME Local 3976 represents a bargaining unit of approximately 400 civil
2 servants who work for the Foreign Agricultural Service in the Washington, D.C. metropolitan area.
3 These employees include International Economists, International Trade Specialists, Nutritionists,
4 Trade Policy Analysts, International Science Advisors, Technical Assistance Specialists,
5 International Market Specialists, and others.

6 28. AFSCME Local 3976 represents the interests of the USDA's Foreign Agricultural
7 Service nonsupervisory civil servants. Its core functions include providing support, guidance, and
8 resources to bargaining unit employees as their officially recognized exclusive representative. As
9 the exclusive representative for the nonsupervisory Foreign Agricultural Service civil servants,
10 AFSCME Local 3976 enters into collective bargaining negotiations with the USDA on a wide
11 variety of terms and conditions of employment and represents bargaining unit members through
12 the negotiated grievance process. AFSCME Local 3976 and the USDA, Foreign Agricultural
13 Service are parties to a collective bargaining agreement that memorializes negotiated terms and
14 conditions of employment, benefits, rules, a grievance procedure and other procedures of the
15 workplace. The current agreement has a term of five years and expires on January 8, 2030.

16 29. AFSCME Local 2846 represents a collective bargaining unit of approximately 112
17 USDA, Office of Operations employees. The Office of Operations is an office within USDA's
18 Departmental Administration that provides leadership, direction, and coordination, in activities at
19 the USDA Headquarters and the George Washington Carver Center (GWCC). Local 2846
20 represents all professional and non-professional employees employed by Office of Operations in
21 the Washington, D.C. metropolitan area. The Local's members mainly include Mail Clerks who
22 process incoming and outgoing mail, distribute delivered mail, and process certified mail.

23 30. AFSCME Local 2846 represents the interests of the USDA's Office of Operations
24 employees. Its core functions include providing support, guidance, and resources to bargaining
25 unit employees as their officially recognized exclusive representative. As the exclusive
26 representative for the nonsupervisory employees, AFSCME Local 2846 enters into collective
27 bargaining negotiations with the USDA on a wide variety of terms and conditions of employment

1 and represents bargaining unit members through the negotiated grievance process. AFSCME Local
2 2846 and the USDA, Office of Operations are parties to a collective bargaining agreement that
3 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance
4 procedure and other procedures of the workplace. The agreement has been effective since 2010
5 and rolls over on an annual basis, unless either party requests to bargain a new agreement.

6 31. AFSCME Local 3020 represents a collective bargaining unit of approximately 50
7 USDA, Office of Hearing and Appeals (OHA) employees. The mission of the OHA is to plan,
8 coordinate, and provide administrative support for the National Appeals Division (NAD), the
9 Office of the Administrative Law Judges (OALJ), and the Office of the Judicial Officer (OJO).
10 Local 3020 represents all professional and nonprofessional employees employed at OHA.
11 AFSCME Local 3020 employees include Hearing Officers, Appeals Officers, Attorney Advisor
12 OALJ, Legal Assistants, Administrative Support Assistants, Appeals Coordinators, Paralegal
13 Specialists, IT Specialists, and Management Analysts.

14 32. AFSCME Local 3020 represents the interests of the USDA's OHA employees. Its
15 core functions include providing support, guidance, and resources to bargaining unit employees as
16 their officially recognized exclusive representative. As the exclusive representative for the
17 nonsupervisory employees, AFSCME Local 3020 enters into collective bargaining negotiations
18 with the USDA on a wide variety of terms and conditions of employment and represents bargaining
19 unit members through the negotiated grievance process. AFSCME Local 3020 and the USDA,
20 OHA are parties to a collective bargaining agreement that memorializes negotiated terms and
21 conditions of employment, benefits, rules, a grievance procedure and other procedures of the
22 workplace. The agreement has been in place since 2019 and renews automatically on an annual
23 basis, unless either party requests to bargain a new agreement.

24 33. AFSCME Local 3870 represents a collective bargaining unit of approximately 126
25 USDA, Rural Development ("RD") employees. Specifically, Local 3870 represents employees at
26 the Rural Utilities Service (RUS) and the Rural Business Cooperative Service (RBCS). At RUS,
27 Local 3870 represents professional and nonprofessional employees in the Washington, D.C.
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1 Metropolitan area. At RCBS, Local 3870 represents professional and nonprofessional employees
2 in the Washington, D.C. Metropolitan area.

3 34. The mission of RUS is to provide loans and grants to water and waste, telephone,
4 and electric companies in rural America to improve the services offered to those communities. The
5 mission of RBCS is to provide loans and grants to businesses in rural America. Bargaining unit
6 employees include Financial & Business Loan Specialists and Management Analysts, Business
7 Loan and Grant Technicians, Management Assistants, Environmental Protection Specialists,
8 General Field Representatives, Sociologists, Loan Technicians, General Field Representatives,
9 and others.

10 35. AFSCME Local 3870 represents the interests of the USDA's RD employees. Its
11 core functions include providing support, guidance, and resources to bargaining unit employees as
12 their officially recognized exclusive representative. As the exclusive representative for the
13 nonsupervisory Foreign Agricultural Service civil servants, AFSCME Local 3870 enters into
14 collective bargaining negotiations with the USDA, RD on a wide variety of terms and conditions
15 of employment and represents bargaining unit members through the negotiated grievance process.
16 AFSCME Local 3870 and the USDA, RD are parties to a collective bargaining agreement that
17 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance
18 procedure and other procedures of the workplace. The agreement has been in place since 2019 and
19 renews automatically on an annual basis, unless either party requests to bargain a new agreement.

20 36. AFSCME Local 3925 represents a collective bargaining unit of approximately 65
21 USDA, Farm Production and Conservation Business Center, (FPCBC) Farm Service Agency
22 (FSA), and Risk Management Agency (RMA) employees. Local 3925 represents all professional
23 and nonprofessional employees employed by the USDA's, FPCBC, FSA, and RMA in the
24 Washington, D.C. metropolitan area.

25 37. AFSCME Local 3925 represents the interests of the USDA's FPCBC, FSA, and
26 RMA employees. Its core functions include providing support, guidance, and resources to
27 bargaining unit employees as their officially recognized exclusive representative. As the exclusive
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1 representative for the nonsupervisory civil servants, AFSCME Local 3925 enters into collective
2 bargaining negotiations with the USDA on a wide variety of terms and conditions of employment
3 and represents bargaining unit members through the negotiated grievance process. AFSCME Local
4 3925 and the USDA, RD are parties to a collective bargaining agreement that memorializes
5 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other
6 procedures of the workplace. The current agreement is effective for a term of four years and expires
7 on September 16, 2028.

8 **AFSCME Members at AmeriCorps and Peace Corps**

9 38. AFSCME Local 2027 represents a collective bargaining unit of approximately 429
10 AmeriCorps employees. The collective bargaining agreement covering these workers is
11 applicable, by its terms, to “all non-professional employees including part-time and intermittent
12 employees.” Bargaining unit members work and live all over the country, including in California,
13 Texas, Alaska, Colorado, Mississippi, Georgia, Ohio, Delaware, among other states and Puerto
14 Rico. These employees include Grant Management Specialists, Logistics Assistants, Data and
15 Analytics Officers, Portfolio Managers, Training Specialists, and others. Many of Local 2027’s
16 bargaining unit members are Portfolio Managers who are out in the field managing and providing
17 oversight to AmeriCorps programs. Others enable the work of AmeriCorps grantees within their
18 organizations.

19 39. AFSCME Local 2027 represents the interests of the AmeriCorps employees. Its
20 core functions include providing support, guidance, and resources to bargaining unit employees as
21 their officially recognized exclusive representative. As the exclusive representative for the
22 nonsupervisory AmeriCorps employees, AFSCME Local 2027 enters into collective bargaining
23 negotiations with AmeriCorps on a wide variety of terms and conditions of employment and
24 represents bargaining unit members through the negotiated grievance process. AFSCME Local
25 2027 and AmeriCorps are parties to a collective bargaining agreement that memorializes
26 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other
27 procedures of the workplace. The current agreement is effective for a term of five years and expires
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1 on January 17, 2030.

2 40. AFSCME Local 3548 represents a bargaining unit of 322 Peace Corps employees.
3 The Peace Corps mission is to promote world peace and friendship through community-based
4 development and intercultural understanding. Generally, AFSCME Local 3548 members work in
5 roles that support our mission to send volunteers abroad, such as recruitment, placement, training,
6 administrative support. These employees include Recruiters, Program Support Assistants,
7 Management and Program Analysts, IT Specialists, Volunteer Placement and Assessment
8 Specialists, Financial Management Specialists, Public Health Program Specialists, Data Analysts,
9 Public Health Analysts, and many more. AFSCME Local 3548 bargaining unit members are
10 stationed all over the U.S. in support of the Peace Corps mission of world peace.

11 41. AFSCME Local 3548 represents the interests of Peace Corps employees. The
12 local's core functions include providing support, guidance, and resources to bargaining unit
13 employees as their officially recognized exclusive representative. As the exclusive representative
14 for Peace Corps employees, AFSCME Local 3548 enters into collective bargaining negotiations
15 with the Peace Corps on a wide variety of terms and conditions of employment and represents
16 bargaining unit members through the negotiated grievance process. AFSCME Local 3548 and the
17 Peace Corps are parties to a collective bargaining agreement that memorializes negotiated terms
18 and conditions of employment, benefits, rules, a grievance procedure and other procedures of the
19 workplace. This agreement has been effective since the 1990s and renews on an annual basis,
20 unless either party requests to bargain a new agreement.

21 **AFSCME Members at U.S. Agency for Global Media**

22 42. AFSCME Local 1418 represents a collective bargaining unit of [number]
23 employees who work for U.S. Agency for Global Media USAGM, specifically at its "Voice of
24 America" (VOA) media outlet. The collective bargaining agreement covering these workers is
25 applicable, by its terms, to "all non-supervisory Radio Broadcast Technicians employed by
26 USAGM in the Radio Master Control" and "Radio Studios" in Washington, D.C., as well as those
27 "assigned to the New York News Bureau" in New York City, NY. Currently, all members of the
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1 bargaining unit work in Washington, D.C. Some bargaining unit members have been in the past,
2 and may also be periodically in the future pursuant to the collective bargaining agreement, assigned
3 to the New York News Bureau, which mainly covers the United Nations, when the bureau there
4 produces radio programing or audio support for television.

5 43. Under the collective bargaining agreement, AFSCME Local 1418 represents two
6 types of employees: Radio Broadcast Technicians (RBT) who work in Radio Studios and RBTs
7 who work in the Radio Master Control. These employees are generally responsible for being
8 present at each language service live broadcast studio at the time the language service is producing
9 a live show and engineering the live show for broadcast. These employees are responsible for
10 engineering live broadcasts of radio programing by running the mixing console in the Radio
11 Studios or working in the Radio Master Control. Most of the bargaining unit members work in the
12 Radio Studios. VOA broadcasts approximately 49 live radio programs in different languages that
13 these employees must engineer to be broadcast. Some of these programs also have video
14 components that are setting up and running equipment for the radio broadcasts such as computer
15 programs, audio and video files, microphones, lights, and cameras for programs with video
16 components. Working under the direction of bilingual directors and producers who understand the
17 language of the programing and can communicate in English with the RBTs, these employees
18 operate the broadcast mechanics of live radio programs. RBTs are essential employees that are
19 vital to maintaining uninterrupted broadcasting operations for VOA. For example, these employees
20 are in the building 24 hours during snow emergencies, continued working during the entire
21 pandemic, and must work during government shutdowns as essential staff.

22 44. AFSCME Local 1418 represents the interests of the VOA's Radio Broadcast
23 Technicians. Its core functions include providing support, guidance, and resources to bargaining
24 unit employees as their officially recognized exclusive representative. As the exclusive
25 representative for the nonsupervisory RBTs, AFSCME Local 1418 enters into collective
26 bargaining negotiations with the USAGM, VOA on a wide variety of terms and conditions of
27 employment and represents bargaining unit members through the negotiated grievance process.

1 AFSCME Local 1418 and the USAGM, VOA are parties to a collective bargaining agreement that
2 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance
3 procedure and other procedures of the workplace.

4 **AFSCME Registered Nurse Members at the VA and DOD**

5 45. Unlike most of AFSCME's federal government employee members who are
6 represented by AFSCME District Council 20 and its affiliated local unions, our members who
7 work for the VA and DOD are represented by the United Nurses Associations of California/United
8 Health Care Professionals, AFSCME, AFL-CIO (UNAC/UHCP). UNAC/UHCP is a labor
9 organization and an unincorporated association headquartered at 955 Overland Ct., Suite 150, San
10 Dimas, California 91773. UNAC/UHCP represents employees of the VA who are employed as
11 registered nurses at Pettis Memorial Hospital in Loma Linda, California, and employees of DOD
12 who are employed as registered nurses at the Naval Medical Center San Diego. UNAC/UHCP is
13 an affiliate union of AFSCME and its members are members of AFSCME. UNAC/UHCP
14 collectively bargains terms and conditions of employment with the VA for Pettis Memorial
15 Hospital and the DOD for the Naval Medical Center, and those collective bargaining agreements
16 are currently in effect.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct.

19 Executed this 27th day of April 2025, in Washington, DC.

20 
21

22 Kory Blake
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